

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY **REGION 10**

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OFFICE OF WATER AND WATERSHEDS

Memo to the File

From: Jill Nogi, NPDES Permit Writer

Personal Communication with Travis Collier, Leavenworth National Fish Hatchery: August 9, 2016

I called the LNFH requesting more information regarding United States Fish and Wildlife Service (USFWS) use of chlorine as a disinfectant. The internal review of the Draft Permit led to a discussion of whether chlorine was in use at the facility. It was reported on August 9, 2016, that chlorine was not needed at the facility, as the soap-based Virkon, currently in use as a disinfectant, met all the needs of the LNFH for fish health. The Hatchery thought it prudent to have to monitor for Chloramine-T, when in use, although it has not ever been used to date. Travis also checked on chlorine use by the Yakama Nation for their Coho Restoration Project, and it was reported on August 9, 2016, that the Yakama Nation does not use chlorine as a disinfectant either.

However; chlorine monitoring, including Chloramine-T is included in the Draft Permit as a monitoring requirement, once daily grab sample on any days that it is in use, even though the USFWS service does not anticipate using chlorine or Chloramine-T. It is there to cover any unforeseen circumstance where those disinfectants might be necessary, in order to collect the data necessary to determine if the reasonable potential to exceed the applicable total residual chlorine criteria in Icicle Creek exists. If that is the case, chlorine limits would be included in future NPDES permits for the LNFH.